

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

B.R. *et al.*,)
Plaintiffs,)
v.)
MARGIE QUIN, in her *official* capacity as the)
Commissioner of the Tennessee Department)
of Children's Services,)
Defendant.)

No. 3:23-cv-00737
Judge Campbell
Magistrate Judge Frensley

**JOINT MOTION TO GRANT
APPROVAL OF THE PARTIES' SETTLEMENT AGREEMENT**

Plaintiffs, B.R. *et al.*, and Defendant, Margie Quin in her official capacity as the Commissioner of the Tennessee Department of Children's Services, ("the Parties"), recently filed a Settlement Agreement (Doc. No. 37), and a Jointly Proposed Order of Dismissal that adopts the Agreement as the Court's own order while dismissing the underlying action with prejudice (Doc. No. 38). After the filing, the Court requested that the Parties submit this motion and its supporting Memorandum "addressing the terms of their agreement and why the Court should approve it." (Doc. No. 39.) The Court also ordered the Parties to "file supporting documentation for their proposed attorney's fee award of \$75,000." (*Id.*) With that, the Parties, by and through counsel, respectfully submit this Joint Motion to Grant Approval of the Parties' Settlement Agreement, accompanied by a supporting Memorandum, and request that the Court approve the Settlement Agreement and enter the Jointly Proposed Order of Dismissal.

Respectfully submitted,

JONATHAN SKRMETTI
ATTORNEY GENERAL & REPORTER

/s/ *Meredith W. Bowen*

MEREDITH W. BOWEN (BPR #34044)
JORDAN CREWS (BPR #34541)
TRENTON MERIWETHER (BPR #38577)
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202-0207
Phone: (615) 741-1366
Meredith.Bowen@ag.tn.gov

Counsel for Defendant

/s/ *Leecia Welch*

Leecia Welch
Katrina Braun
Stephen Dixon
Eleanor Roberts
Children's Rights, Inc.
88 Pine Street, Suite 800
New York, NY 10005
Phone: (212) 683-2210
lwelch@childrensrights.org
eroberts@childrensrights.org
sdixon@childrensrights.org
kbraun@childrensrights.org

Paige Waldrop Mills
Bass, Berry & Sims (Nashville Office)
150 Third Avenue South, Suite 2800
Nashville, TN 37201
Phone: (615) 742-6200
pmills@bassberry.com

Irene A. Firippis
Paul M. Thompson
Rodney D. Swartz
Sam C. Neel
Bailey Sanders
McDermott, Will & Emery LLP
500 N. Capitol Street NW
Washington, DC 20001-1531

Phone: (202) 756-8032
ifirippis@mwe.com
sneel@mwe.com
pthompson@mwe.com
rswartz@mwe.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this February 1, 2024, a true and correct copy of the foregoing Joint Motion to Grant Approval of the Parties' Settlement Agreement has been served via the Court's electronic filing system.

Jordan K. Crews
Meredith Wood Bowen
Trenton Meriwether
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202-0207
Jordan.cres@ag.tn.gov
Meredith.Bowen@ag.tn.gov
Trenton.meriwether@ag.tn.gov

Counsel for Defendant

/s/ Leecia Welch
Leecia Welch